

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
MIDLAND/ODESSA DIVISION**

VIRTAMOVE CORP.,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Civil Action No.: 7:24-cv-00033

**NOTICE REGARDING DEFENDANT GOOGLE LLC'S RESPONSE TO SECOND  
AMENDED COMPLAINT**

Defendant Google LLC hereby notifies the Court, pursuant to the parties' Stipulation Regarding Plaintiff's Second Amended Complaint and Defendant's Rule 12 Motion to Dismiss (Dkt. 73), that Google LLC's Motion to Dismiss the First Amended Complaint (Dkt. 36) serves as its responsive pleading to Plaintiff VirtaMove Corp.'s Second Amended Complaint, and the arguments contained therein shall apply equally to VirtaMove's Second Amended Complaint. Google filed this Motion on June 18, 2024. VirtaMove filed its Opposition on July 2, 2024 (Dkt. 42). Google filed its Reply on July 16, 2024 (Dkt. 47). Therefore, Google's Motion is now fully briefed and ready for resolution.

DATED: December 20, 2024

Respectfully submitted,

/s/ David A. Perlson

David A. Perlson (*admitted pro hac vice*)  
davidperlson@quinnemanuel.com  
Quinn Emanuel Urquhart & Sullivan, LLP  
50 California Street, 22nd Floor  
San Francisco, California 94111-4788  
Telephone: (415) 875-6600  
Fax: (415) 875-6700

Deepa Acharya  
deepaacharya@quinnemanuel.com  
1300 I Street NW, Suite 900  
Quinn Emanuel Urquhart & Sullivan, LLP  
Washington, District of Columbia 20005-3314  
Telephone: (202) 538-8000  
Fax: (202) 538-8100

/s/ Katharine L. Carmona

Katharine Lee Carmona  
Texas State Bar No. 00787399  
kcarmona@jw.com  
Jackson Walker L.L.P.  
100 Congress Avenue, Suite 1100  
Austin, Texas 78701  
(512) 236-2000  
(512) 236-2002 (facsimile)

Nathaniel St. Clair, II  
Texas State Bar No. 24071564  
nstclair@jw.com  
2323 Ross Avenue, Suite 600  
Dallas, Texas 75201  
(214) 953-6000  
(214) 953-5822 (facsimile)

Erica Benites Giese  
Texas State Bar No. 24036212  
egiese@jw.com  
1900 Broadway, Suite 1200  
San Antonio, Texas 78215  
(210) 978-7700  
(210) 978-7790 (facsimile)

*Counsel for Defendant Google LLC*

**CERTIFICATE OF SERVICE**

Pursuant to the Federal Rules of Civil Procedure and Local Rule CV-5, I hereby certify that, on December 20, 2024, I electronically filed the foregoing document using the CM/ECF system, which will send notification of such filing to counsel for all parties of record.

/s/ Katharine L. Carmona

Katharine Lee Carmona